

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900001-2020 (4 of 5)**
Application Received: **September 4, 2019**
Plant Identification Number: **03900001**
Permittee: **The Chemours Company FC, LLC**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Ave.**
Belle, WV 25015

Physical Location: Belle, Kanawha County, West Virginia
UTM Coordinates: 451.90 km Easting • 4232.60 km Northing • Zone 17
Directions: US Route 60 exit, then right onto Dupont Avenue, then left at plant gate.

Facility Description

Manufacturer of various organic chemicals. Production of "Vazo" and glycolic acid.
SIC codes: 2869; 2879

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 4 Only)	2019 Actual Emissions (Facility Wide)
Carbon Monoxide (CO)	13.1	95.33
Nitrogen Oxides (NO _x)	6.8	268.07
Particulate Matter (PM _{2.5})	0.30	8.84
Particulate Matter (PM ₁₀)	0.30	8.84

Regulated Pollutants	Potential Emissions (Group 4 Only)	2019 Actual Emissions (Facility Wide)
Total Particulate Matter (TSP)	1.00	8.86
Sulfur Dioxide (SO ₂)	<0.01	0.56
Volatile Organic Compounds (VOC)	153	564.09
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions (Group 4 Only)	2019 Actual Emissions (Facility Wide)
Carbon Tetrachloride	31.00	0.11
Chloroform	79.00	0.16
Methanol	15.50	48.65
Formaldehyde	2.50	1.50
HCL	1.00	0.19
Methyl Isobutyl Ketone	2.00	0.01
Total HAP's	131.00	58.45

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds. The facility also has the potential to emit over 10 tons per year of single HAP's and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, The Chemours Company FC, LLC's Belle Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	New Stationary Sources
	45CSR§21-5.2	VOC Emissions
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Kb	Tanks

	40 C.F.R. Part 63 FFFF	Miscellaneous Organic NESHAP
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	VOC Emissions
	45CSR27	Toxic Air Pollutants

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1399A	12/10/2001	
R13-1534C	4/21/2020	
CO-R21-97-31	9/10/1997	
CO-R21-C-2001-10A(97)	4/10/2001	
CO-R27-91-40A	11/14/1991	
CO-R27-92-45A(91)	5/27/1992	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This renewal Permit includes R30-03900001-2015 MM02 (Part 4 of 5) which incorporates the changes permitted under R13-1534C. Since the most recent version of this permit, the following changes have been made:

General Changes

The address for EPA has been updated in Condition 3.5.3.

The Permit number in Section 1.2 has been updated.

The Emission Point ID for G031 through G036 has been changed from N/A to 251.040 in the Section 1.1 Emission Units Table as these units emit to the Control Device G040.

The year installed date in the Section 1.1 Emission Units Table for Units G007, G025, and G026 has been updated as these tanks have been replaced. None of the tanks are larger than 75 m³, and do not trigger 40CFR60 Subpart Kb, nor any other applicable requirements.

New Emission Unit G036, a high pressure pump, has been added. This is a pump in light liquid service and subject to the 40CFR63, Subpart FFFF MON MACT. This pump is subject to 5.1.25.(B)(5).

For the emission units in the Glycolic Acid production that vent to the Thermal Oxidizer G040, G028 (Scrubber) has been added to the Control Device column in the Section 1.1 Emission Units Table as Condition 5.1.5.A allows the Scrubber to be used for 20 minutes if the Thermal Oxidizer fails.

Vazo

The Hydrochloric Acid limit for Vazo 67 has been corrected from “020” to “0.20” to correct a missing decimal point.

Glycolic Acid

Changes due to R13-1534C:

R13-1534C has been added to Condition 3.1.9.

The Carbon Monoxide inlet emission limit going into the Thermal Oxidizer (G040) has been removed in Condition 5.1.1.

The thermal destruction efficiency has been increased from 99% for carbon monoxide to 99.99% in Condition 5.1.4.C.

With the transition of R13-1534C to the newest format, the following citations have changed:

- a. A.1. to 4.1.1
- b. A.2. to 4.1.2
- c. A.3. to 4.1.3
- d. A.4. to 4.1.4
- e. A.5. to 4.1.5
- f. A.6. to 4.1.6
- g. B.1. to 4.2.1
- h. B.2. to 4.2.2
- i. B.3. to 4.5.1
- j. B.4. to 4.1.7
- k. B.5. to 4.1.8.
- l. B.6. to 4.1.10, 4.1.11, 4.1.12, and 4.1.13.
- m. B.7. to 4.1.14, 4.1.15, 4.1.16, and 4.1.17.
- n. B.9. to 4.1.18
- o. C.3 to 2.5.1

The citation for Condition 5.1.9 has been revised to reflect the new R13-1534C Condition 4.1.9.

The citation for Condition 5.1.17 has been revised to reflect the new R13-1534C Condition 4.1.17.

The tank ID (G006) has been added to Condition 5.1.5.B.

Condition 5.1.27 has been added to include the requirements of new R13-1534C Condition 4.1.18.

Condition 5.1.28 has been added to include the requirements of new R13-1534C Condition 4.1.19.

Added “45CSR13, Permit No. R13-1534 -(Condition 4.1.18);” to the citation in Condition 3.4.1.

Added the new R13-1534C conditions to maintain records of maintenance and malfunctions as Conditions 5.4.5 and 5.4.6.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

This Group does not have a pollutant specific emissions unit (PSEU) for any pollutant meeting the applicability requirements of 40 C.F.R. §64.2 and therefore does not need to have submitted a CAM plan in accordance with the CAM rule.

This facility is not subject for the following reason:

40CFR§64.2(a)(3) – This Group does not have a PSEU with potential pre-control device emissions equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: June 2, 2020
Ending Date: July 2, 2020

Point of Contact

All written comments should be addressed to the following individual and office:

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41255 • Fax: 304/926-0478
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

N/A